

August 13, 2013

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus,  
MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

The Open Media Foundation is writing in support of the comments filed by the Alliance for Community Media, the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors regarding *FCC 13-77*.

The Open Media Foundation operates 4 TV stations in Denver Colorado, including three Public Access TV stations and one State Government Channel. Our channels are cablecast to hundreds of thousands of homes in Denver (Denver Open Media) and state-wide (Colorado Channel).

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, Comcast displays only the theme-block or Genre currently airing, not the name of each show. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

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